REMARKS

Reconsideration of this application is respectfully requested. Claims 1-10 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 11, 13, 14, 19, and 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Number 4,862,156 by Westberg et al. (hereinafter "Westberg"). Claims 1-4, 6-9, 12, 15, 18, and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Westberg in view of Nishimura, U.S. Patent No. 5,928,361 (hereinafter " Nishimura"). Claims 5 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Westberg in view of Nishimura in view of Schreiber et al., U.S. Patent 6,298,446. Claims 16 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Westberg in view of Schreiber.

Claims 1, 4-6, 9-10, 16, 17, and 22 have been amended.

Claim Rejections - 35 USC § 112

Claims 1-10 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Examiner states "The omitted elements are: deleting protected data to a requestor and not delivering protected data to the requestor. Suitable elements can also recite the intent to "protect against unauthorized monitoring and/or unauthorized copying" as is recited in the applicant's specification." Applicants submit independent claims 1 and 6, as amended, overcome the above rejection. Applicants also submit that claims 2-5 and 7-10, as amended, also overcome the above rejection.

Claim Objections

The office action states that claims 11, 16, 17, and 22 are objected to because of informalities. The office action states that claim 11 at lines 5 and 6; claim 16 at line 2; claim 17 at lines 9 and 10; and claim 22 at line 2, recite the term "data" which creates confusion in the claim language since it is later recited the term of "protected data" and appears that the "data" is to be "protected data". The office action states that in claim 17 at line 8 "and" needs to be deleted.

Applicants respectfully submit claims 11, 16, 17, and 22, as amended, overcome the above rejection.

Claim Rejections -35 USC § 102

Claims 11, 13, 14,19, and 20 are rejected under 35 U.S.C. 102(b) as being anticipated by Westberg. Claims 1-4, 6-9, 12, 15, 18, and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Westberg in view of Nishimura. Claims 5 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Westberg in view of Nishimura in view of Schreiber. Claims 16 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Westberg in view of Schreiber.

Applicants respectfully submit that amended claim 11 is not anticipated by Westberg under 35 U.S.C. 102(b).

Claim 11, as amended, states:

> 11. An apparatus, comprising:
> a presentation controller having:
> a presentation buffer;
> a command handler to process commands and addresses;

a data handler coupled to the presentation buffer to monitor data and to pass at least a part of the monitored data to the presentation buffer;
    a security violation detector to detect a request by a requestor to read protected data in the presentation buffer; and
    a data protector coupled to the data handler to prevent providing the protected data to the requestor, wherein the presentation buffer to supply the at least a part of the monitored data in a properly formatted form to be displayed to a display device.

Westberg discloses an Atari video game machine. Westberg discloses how to make newer versions of the video game machine, such as a Playstation 2, capable of playing video game cartridges designed to play with the newer Playstation 2 video graphics controller as well as capable of playing the older video game cartridges designed to play with the older Playstation 1 video graphics controller. As such, Westberg teaches and discloses how the system components determine which version of game cartridge is plugged in and how to properly execute the program stored in the external memory contained within that plug-in game cartridge. Westberg discusses aspects of the execution of the instructions of the program stored in the plug-in external memory but does not disclose the details of the actual display of the rendered images resulting from the execution of the instructions. Essentially, Westberg describes the front-end portion of the video process on how to properly determine and execute instructions in a program and is silent on the back-end portion of the video process that details how to properly display the objects and images that result from the execution of the instructions in a program. Thus, Westberg does not actually disclose a presentation buffer that stores data in a properly formatted form to be displayed on a display device.

Westberg discloses:

It is an object of the invention to provide an improved dual-mode video computer system which is capable of executing at least two different

types of graphics programs designed for at least two different graphics controllers. (Col. 2, Lns. 40-45)

A read only memory (ROM) 12 stores the graphics program and graphics data, and, in most video computers, comprises a removable cartridge which may be plugged into and removed from a cartridge slot in the computer. (Col. 4, Lns. 8-12)

The video computer system is improved in that it comprises not only a first graphics control circuit for executing a first type of graphics program stored in memory, but also a second graphics control circuit for executing a second type of graphics program which may not be compatibly executed on the first graphics control circuits. A select circuit automatically determines which type of graphics program is stored in memory and initializes the corresponding graphics circuit to [either] compatibly execute the graphics program [or attempt to execute the graphic program with a non compatible graphics circuit if an encrypted digital signature associated with the graphic program is not verified as authentic.] (Col. 4, Lns. 4-13) and (Col. 7, Lns. 38-45)

The Examiner asserts that the RAM 16 in Westberg discloses a presentation buffer. However, RAM 16 is not a presentation buffer that stores data in a properly formatted form to be displayed on a display device. Westberg discloses that RAM 16 may store the video program from the plug-in external memory that is to be executed by one of the graphics controllers. (See the quoted sections above as well as See Col. 5, Ln. 61 thru Col. 6 Ln. 3 and Col. 6 Lns 16-24). However, as discussed, Westberg is silent on a presentation buffer that stores data in a properly formatted form to be displayed on a display device. Accordingly, Westberg also does not disclose a security violation detector to detect a request by a requestor to read protected data in the presentation buffer.

Therefore, Westberg does not disclose each and every limitation of amended

claim 11. As such, claim 11, as amended, is not anticipated by Westberg under 35

U.S.C. 102(b).

Given that claims 12-16 are dependent directly or indirectly with respect to

amended claim 11, applicants submit that claims 12-16 are not anticipated by Westberg

under 35 U.S.C. § 102(b).

Similarly, independent claim 17, as amended, states:

> 17. A system, comprising:
>   a presentation circuit including:
>   an input interface to receive data;
>   an output port to transmit data in a properly formatted form to be displayed on a display device;
>   a presentation buffer coupled to the output port;
>   a presentation controller coupled to the presentation buffer and to the input interface and having:
>   a command handler to process commands and addresses; and
>   a data handler to monitor data and to pass at least a part of the monitored data to the presentation buffer;
>   a security violation detector to detect a request by a requestor to read protected data in the presentation buffer; and
>   a data protector to prevent providing the protected data to the requestor.

As discussed above, Westberg merely discloses RAM 16 that stores the video

program stored in the memory of an external plug in cartridge. Westberg does not

disclose "an output port to transmit data in a properly formatted form to be displayed on

a display device" Westberg also does not disclose "a presentation buffer coupled to the

output port." Westberg also does not disclose "a security violation detector to detect a

request by a requestor to read protected data in the presentation buffer."

Therefore, Westberg does not disclose each and every limitation of amended

claim 17. As such, claim 17, as amended, is not anticipated by Westberg under 35

U.S.C. 102(b).

Given that claims 18-22 are dependent directly or indirectly with respect to

amended claim 17, applicants submit that claims 18-22 are not anticipated by Westberg

under 35 U.S.C. § 102(b).

Claim Rejections -35 USC § 103

For similar reasons, claim 1-22 are not obvious in view of combinations of

Westberg, Nishimura, and/or Schreiber.

Westberg merely discloses RAM 16 that stores the video program stored in the

memory of an external plug in cartridge. Westberg does not disclose "receiving data in

a presentation buffer of a presentation controller, where the data in the presentation

buffer is in a properly formatted form to be displayed on a display device." Westberg

also does not disclose "receiving a request from a requestor to read the data in the

presentation buffer." Westberg also does not disclose "deleting protected data from the

presentation buffer in response to the request."

Therefore, the combination of Westberg and the other references do not disclose

each and every limitation in claims 1-22.

Further, Nishimura discloses:

> This invention relates to security of data contained in a one-chip
> microcomputer which is configured to be one-time programmable (OTP)
> or multi-time programmable (MTP). (Col. 1, Lns. 1-3)

The one time or multiple time programmable storage device described in

Nishimura is non analogous art to the kind of video system RAM 16 storage device

described in Westberg. Nishimura teaches a storage device that changes its stored data once or possibly several times during the life of the device housing the one time or multiple time programmable storage device. Typically, unique serial numbers or decryption keys are stored in such one time or multiple time programmable storage devices. Nishumura gives the example of "a user for such one-chip microcomputer provides a self developed program to a vender for one-chip microcomputers. The vender performs writing of this program into a P-ROM of the one-chip microcomputer to deliver it to the user. In this manner, the user acquires a one-chip microcomputer stored with a program as desired." (Col. 1, Lns. 10-15) Thus, the content in the storage device is stored once during the lifetime of the device housing the one time or multiple time programmable storage device. The data stored in Westberg's video system RAM 16 changes as often as a video cartridge is plugged into the machine.

Under 35 U.S.C. 103, the Nishumura reference must be analogous art in order to rely on that reference as a basis for rejection. Nishimura's one time or multiple time programmable storage device is not used in a video computing system rather its merely disclosed as being used in one time programmable microchip applications. Further, Nishimura's one time or multiple time programmable storage device is not reasonably pertinent to protecting data in a presentation buffer, which is in a properly formatted form to be displayed on a display device. Therefore, the combination of Nishumura with either Westberg or Schreiber under 35 U.S.C. 103 is improper. Applicants respectfully request the withdrawal of the 103 rejections using Nishumura.

Conclusion

It is respectfully submitted that in view of the amendments and remarks set forth

herein, the rejections and objections have been overcome. A petition for an extension

of time is submitted with this amendment. Applicants reserve all rights with respect to

the application of the doctrine equivalents. If there are any additional charges, please

charge them to our Deposit Account No. 02-2666. Applicant respectfully requests that a

timely Notice of Allowance be issued in this case.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: _____ 6-23-05 _____   _____

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